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13 *Toshiba America, Inc.,*

14 *Toshiba America Consumer Products, LLC,*

15 *Toshiba America Information Systems, Inc.,*

16 *and Toshiba America Electronic Components, Inc.*

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 (SAN FRANCISCO DIVISION)

20 IN RE: CATHODE RAY TUBE (CRT)  
21 ANTITRUST LITIGATION

22 Case No. 07-5944 SC  
23 MDL No. 1917

24 This Document Relates To:

25 *The Indirect Purchaser Action*

26 **DECLARATION OF LUCIUS B.  
27 LAU IN SUPPORT OF THE  
28 TOSHIBA DEFENDANTS'  
OPPOSITION TO INDIRECT  
PURCHASER PLAINTIFFS'  
MOTION IN *LIMINE* NO. 17:**

**TO (1) PRECLUDE ARGUMENT  
THAT THE SAMSUNG SDI  
GUILTY PLEA INCLUDES DOJ  
FINDINGS OF FACT; (2)  
EXCLUDE EVIDENCE OF THE  
VOLUME OF AFFECTED SALES  
IN THE GUILTY PLEA; (3)  
EXCLUDE EVIDENCE OF THE  
FACT AND AMOUNT OF THE**

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF TOSHIBA'S OPPOSITION TO IPFS' MOTION IN  
*LIMINE* NO. 17

Case No. 07-5944-SC  
MDL No. 1917

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Washington, DC 20005

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**CRIMINAL FINE; AND (4)  
EXCLUDE ANY STATEMENT BY  
THE DOJ CHARACTERIZING  
THE CRT CONSPIRACY**

1 I, Lucius B. Lau, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, counsel for  
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer  
4 Products, LLC, Toshiba America Information Systems, Inc., and Toshiba America Electronic  
5 Components, Inc. (collectively, the "Toshiba Defendants").

6 2. I submit this declaration in support of the Toshiba's Opposition to Indirect  
7 Purchaser Plaintiffs' Motion *in Limine* No. 17: To (1) Preclude Argument that the Samsung  
8 SDI Guilty Plea Includes DOJ Findings of Fact; (2) Exclude Evidence of the Volume of  
9 Affected Sales in the Guilty Plea; (3) Exclude Evidence of the Fact and Amount of the  
10 Criminal Fine; and (4) Exclude Any Statement by the DOJ Characterizing the CRT  
11 Conspiracy. I have personal knowledge of the facts stated herein, and I could and would  
12 competently testify thereto if called as a witness.

13 3. Attached hereto as Exhibit A is a true and correct copy of pages 18-19 of the  
14 Rebuttal Report of Janet S. Netz, Ph.D, dated September 26, 2014.

15 I declare under penalty of perjury under the laws of the United States of America that  
16 the foregoing is true and correct.

17 Executed this 27<sup>th</sup> day of February, 2015, in Washington, D.C.

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Lucius B. Lau